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6 *Attorneys for Defendant*
7 *NETFLIX, INC.*

8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**

10 LAURI VALJAKKA,

11 *Plaintiff,*

12 v.

13 NETFLIX, INC.,

14 *Defendant.*

Case No. 4:22-cv-01490-JST

**DECLARATION OF ELISE EDLIN IN
SUPPORT OF DEFENDANT NETFLIX,
INC.'S ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
SEALED [MOTION FOR AN ORDER TO
SHOW CAUSE AND SANCTIONS]**

Judge: Hon. Jon S. Tigar

1 I, Elise Edlin, hereby declare:

2 1. I am an attorney with the law firm Perkins Coie LLP, based in Walnut Creek,
3 California, and counsel representing Defendant Netflix, Inc. I have personal knowledge of the facts
4 set forth in this declaration and am competent to testify.

5 2. Pursuant to Civil L.R. 79-5, I make this declaration in support of Netflix's
6 Administrative Motion to Consider Whether Another Party's Material Should Be Sealed
7 ("Motion"). Non-party AiPi, LLC ("AiPi") has designated exhibits and material discussed in
8 Netflix's Motion for an Order to Show Cause and Sanctions ("OSC and Sanctions Motion") as
9 Protected Material as defined by § 2(f) of the Stipulated Protective Order for Litigation Involving
10 Patents, Highly Sensitive Confidential Information and/or Trade Secrets (Dkt. No. 56) ("Protective
11 Order").

12 3. The highlighted portions of Netflix's OSC and Sanctions Motion contain discussion
13 of documents produced by AiPi that it designated as CONFIDENTIAL under the Protective Order.

14 4. Exhibits J through O to the Declaration of Elise Edlin in support of Netflix's OSC
15 and Sanctions Motion are documents produced by AiPi that it designated as CONFIDENTIAL
16 under the Protective Order.

17 I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true
18 and correct to the best of my knowledge.

19 Executed on February 18, 2025 in San Francisco, California.

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21 /s/ Elise Edlin

22 Elise Edlin
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